

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

WHITNEY NATIONAL BANK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:07-cv-00415-ID-TFM
	)	
HIGHWAY SOLUTIONS, LLC;	)	
MICHAEL C. MARCATO and	)	
ANNE S. MARCATO,	)	
	)	
Defendants.	)	

**JOINT REPORT OF PARTIES' PLANNING MEETING**

Plaintiff Whitney National Bank ("Whitney") and defendant Highway Solutions, Inc. ("Highway Solutions"), hereby submit the following report of their Planning Meeting.

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on August 13, 2007. The meeting was attended by Gregory C. Cook for plaintiff and David Martin for defendant Highway Solutions.

2. Synopsis of Case. This is essentially a collections action by Whitney on a specified set of loans and debts owed by Highway Solutions. Highway Solutions has admitted entering into such loans and incurring such debts but denies that any money is owed.

3. Pre-Discovery Disclosures and Other Matters. The parties will make their initial disclosures no later than August 28, 2007.

4. Pre-Trial/Discovery Plan. The parties jointly propose to the Court the following tentative pre-trial/discovery plan:

August 28, 2007:	Initial Disclosures
September 14, 2007:	Deadline for plaintiff to move for leave to join additional parties or amend pleadings.
October 4, 2007:	Deadline for defendants to move for leave to join additional parties or amend pleadings.
October 10, 2007:	All Fed.R.Civ.P. 26(a)(2)) information must be provided by plaintiff.
October 10, 2007:	All Fed.R.Civ.P. 26(a)(2) information must be provided by defendants.
November 12, 2007:	All discovery must be initiated in time to be complete by this date.
November 15, 2007:	Deadline for any party to file a Motion for Summary Judgment. If any such motion is filed (whether on this or any other), the responding party shall have 14 days for a reply and the moving party shall have 7 days to file a rebuttal.
January 3, 2007:	All parties file witness and exhibit lists and any designation of deposition testimony.
January 17, 2007:	All parties object to witness and exhibit lists and designated deposition testimony.
January 17, 2007:	All parties file motions in limine.
March 31, 2008:	Trial

5. Additional Limitations on Discovery. The parties jointly propose to the Court the following additional limitations on discovery:

- (a) Maximum of 30 interrogatories by each party to any other party unless otherwise agreed to by the parties or upon leave of Court. [Responses due 30 days after service.]
- (b) Maximum of 30 requests for admission by each party to any other party unless otherwise agreed to by the parties or upon leave of Court. [Responses due 30 days after service.]
- (c) Maximum of 7 depositions by any party, unless otherwise agreed to by the parties or upon leave of Court.
- (d) Each deposition is limited to a maximum of 7 hours unless otherwise agreed to by the parties or upon leave of Court.

6. Scheduling Order. The parties do not request a conference with the Court before entry of a scheduling order.

7. Settlement. Settlement cannot be evaluated prior to October 15, 2007.

8. Pre-Trial Conference. The parties request a pre-trial conference in February, 2008.

9. The parties consent to electronic service of documents and pleadings and agree that service occurs on the day electronically filed.

Respectfully submitted,

/s/ Gregory C. Cook

One of the Attorneys for Plaintiff  
Whitney National Bank

**OF COUNSEL:**

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/s/ J. David Martin

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